

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA) Criminal No 21cr30001
v.) Violations:
MICHAEL GEOFFROY, a/k/a) Counts One through Four: Sexual
“mikejones85,” “Krr Grr”) Exploitation of a Child; Aiding and Abetting
Defendant) (18 U.S.C. §§ 2251(a) and 2)
) Counts Five through Eight: Distribution of Child
) Pornography
) (18 U.S.C. §§ 2252A(a)(2)(A) and (b)(1))
) Count Nine: Possession of Child Pornography
) (18 U.S.C. §§ 2252A(a)(5)(B) and (b)(2))
) Forfeiture Allegation:
) (18 U.S.C. § 2253)

INDICTMENT

COUNTS ONE THROUGH FOUR

Sexual Exploitation of a Child
(18 U.S.C. §§ 2251(a))

The Grand Jury charges:

On or about each of the dates set forth below, in the District of Massachusetts and elsewhere, the defendant,

MICHAEL GEOFFROY, a/k/a “mikejones85,” “Krr Grr”

did knowingly employ, use, persuade, induce, and entice a person under the age of eighteen to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct and for the purpose of transmitting a live visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce, such depiction was produced using

materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means including by computer, and such depiction was actually transported and transmitted in and affecting interstate and foreign commerce, as follows:

Count	Date (on or about)	Minor Involved	Visual Depiction of Sexually Explicit Conduct
1	December 2020	Minor A	0a84e21e-5126-4a92-9779-1588c3ea327e.mp4
2	December 2020	Minor A	63e55059-9a82-4005-b062-037caade8155.jpg
3	December 2020	Minor A	d6105150-2063-4a77-a0ab-3f94567ec76c.jpg
4	December 2020	Minor A	2f2271d7-491c-43a0-8f05-68e5e8a75e18.mp4

All in violation of Title 18, United States Code, Sections 2251(a) and 2.

COUNTS FIVE THROUGH EIGHT
Distribution of Child Pornography
(18 U.S.C. §§ 2252A(a)(2)(A) and (b)(1))

The Grand Jury further charges:

On or about each of the dates set forth below, in the District of Massachusetts, and elsewhere, the defendant,

MICHAEL GEOFFROY, a/k/a "mikejones85," "Krr Grr"

knowingly distributed and attempted to distribute, any child pornography, as defined in Title 18, United States Code, Section 2256(8), that had been mailed, and using any means and facility of interstate and foreign commerce shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, as follows.

Count	Date (on or about)	Act of Distribution of Child Pornography
5	December 17, 2020	Transfer to multiple Kik users of 0a84e21e-5126-4a92-9779-1588c3ea327e.mp4
6	December 17, 2020	Transfer to multiple Kik users of 63e55059-9a82-4005-b062-037caade8155.jpg
7	December 17, 2020	Transfer to multiple Kik users of d6105150-2063-4a77-a0ab-3f94567ec76c.jpg
8	December 18, 2020	Transfer to multiple Kik users of 2f2271d7-491c-43a0-8f05-68e5e8a75e18.mp4

All in violation of Title 18, United States Code, Sections 2252A(a)(2)(A) and (b)(1).

COUNT NINE
Possession of Child Pornography
(18 U.S.C. §§ 2252A(a)(5)(B) and (b)(2))

The Grand Jury further charges:

Between on or about December 17, 2020, and December 18, 2020, in the District of Massachusetts, the defendant,

MICHAEL GEOFFROY, a/k/a "mikejones85," "Krr Grr"

knowingly possessed material that contained one and more images of child pornography, as defined in Title 18, United States Code, Section 2256(8), that involved a prepubescent minor and a minor who had not attained 12 years of age, and that had been mailed, and shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and (b)(2).

FORFEITURE ALLEGATION
(18 U.S.C. § 2253)

The Grand Jury further finds:

1. Upon conviction of one or more of the offenses in violation of Title 18, United States Code, Sections 2251 and 2, 2252A(a)(2)(A) and (b)(1), and 2252A(a)(5)(B) and (b)(2), set forth in Counts One through Nine of this Indictment, the defendant,

MICHAEL GEOFFROY, a/k/a "mikejones85," "Krr Grr"

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 2253, (i) any visual depiction described in sections 2251, 2251A, 2252, 2252A, 2252B, or 2260 of Chapter 110 of Title 18, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of Chapter 110 of Title 18; (ii) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and (iii) any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses or any property traceable to such property. The property to be forfeited includes, but is not limited to, the following:

a. Apple iPhone 11 bearing serial number C7CC4VYDN72L.

2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Section 2253, as a result of any act or omission of the defendant --

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;

- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States of America, pursuant to Title 18, United States Code, Section 2253(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 1 above.

All pursuant to Title 18, United States Code, Section 2253.

A TRUE BILL



FOREPERSON



ALEX J. GRANT
ASSISTANT UNITED STATES ATTORNEY
DISTRICT OF MASSACHUSETTS

District of Massachusetts: JANUARY 06 2021
Returned into the District Court by the Grand Jurors and filed.

Thomas F. Quinn 1/6/21 at 3:00pm
DEPUTY CLERK